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October 27, 2021

VIA ECF

The Honorable Alison J. Nathan United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Dear Judge Nathan:

Attached is Ms. Maxwell's motion under Federal Rule of Evidence 412. Subsection (2)(c) of the Rule requires this motion to be sealed unless this Court orders otherwise.

Accordingly, unless instructed by the Court, Ms. Maxwell will not file this motion on the public docket.

The Rule also requires Ms. Maxwell to notify the alleged victims whose behavior is at issue in the motion. Accordingly, unless otherwise directed, we will serve a redacted copy of this motion tailored to each alleged victim addressed in the motion on their counsel of record and provide proof of service to the Court when it is accomplished.

Respectfully Submitted,

Jeffrey S. Pagliuca

CC: Counsel of Record (via ECF)